

MORVILLO ABRAMOWITZ GRAND IASON & ANELLO P.C.

ELKAN ABRAMOWITZ
RICHARD F. ALBERT
ROBERT J. ANELLO*
KATHLEEN E. CASSIDY
BENJAMIN S. FISCHER
CATHERINE M. FOTI
CHRISTOPHER B. HARWOOD
LAWRENCE IASON
BRIAN A. JACOBS
TELEMACHUS P. KASULIS
KAREN R. KING
ROBERT M. RADICK*
JONATHAN S. SACK**
EDWARD M. SPIRO
JEREMY H. TEMKIN
RICHARD D. WEINBERG

565 FIFTH AVENUE
NEW YORK, NEW YORK 10017
(212) 856-9600
FAX: (212) 856-9494

www.maglaw.com

WRITER'S CONTACT INFORMATION

espiro@maglaw.com
(212) 880-9460

SENIOR COUNSEL
PAUL R. GRAND

COUNSEL
JASMINE JUTEAU

ROBERT G. MORVILLO
1938-2011

MICHAEL C. SILBERBERG
1940-2002

JOHN J. TIGUE, JR.
1939-2009

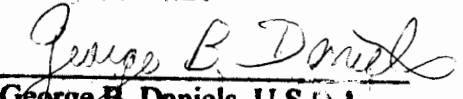
*ALSO ADMITTED IN WASHINGTON, D.C.
**ALSO ADMITTED IN CONNECTICUT

October 13, 2022

Via ECF

The Honorable George B. Daniels
United States District Judge
Southern District of New York
500 Pearl Street, Room 1310
New York, NY 10007

SO ORDERED:


George B. Daniels, U.S.D.J.

Dated: OCT 18 2022

Re: *In re Terrorist Attacks on September 11, 2001*, No. 03-md-01570 (GBD) (SN)

Dear Judge Daniels:

I, together with Kirsch & Niehaus PLLC, represent Kreindler & Kreindler LLP ("K&K") in connection with K&K's forthcoming Rule 72(a) objections to Magistrate Judge Sarah Netburn's recent Order imposing sanctions against the law firm. *See* ECF No. 8544. K&K's objections are due October 21, 2022.

In order to sufficiently raise its legal and factual objections, K&K respectfully requests expanded page limits of 40 pages for its initial brief and 15 pages for its reply brief. The Magistrate Judge's Order, in addition to its 65-page length, raises complex constitutional and statutory questions that require additional pages to address properly. The parties' Proposed Findings of Fact and Conclusions of Law were of an even greater length. *See* ECF No. 7386 (57 pages); ECF No. 7389 (99 pages).

K&K consents to a similar limit of 40 pages for Defendant Kingdom of Saudi Arabia's opposition brief. Defendant takes no position on K&K's request.

Respectfully submitted,

/s/ Edward M. Spiro
Edward M. Spiro
Counsel for Kreindler & Kreindler LLP

Cc: All MDL Counsel of Record (via ECF)